IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA

Richmond Division

IN RE:)	
)	
CHRISTIE MARIE LISBON)	Case No. 19-31894-KLP
)	Chapter 13
Debtor	j	-

MOTION TO INCUR DEBT

COMES NOW, the Debtor, by counsel, and as and for her Motion to Incur Debt, states as follows:

- 1. The Debtor filed this case under Chapter 13 of the U.S. Bankruptcy Code on April 8, 2019.
- 2. The Debtor has applied for and Mechanicsville Honda has approved a loan to the Debtor in the amount of \$19,304.27 plus interest at 14.75% per annum to be repaid with 72 equal monthly payments of \$408.83 for the purchase of a 2018 Honda HR-V or similar vehicle.
- 3. The Debtor needs to purchase the referenced vehicle because her current vehicle has some serious mechanical problems, and she needs a replacement vehicle to continue to travel to and from work and other matters.
- 4. The purchase of the vehicle is in the best interest of the Debtor and will facilitate her ability to perform under his Chapter 13 Plan filed herein.
 - 5. The Debtor's Chapter 13 Plan has been confirmed.

WHEREFORE, the Debtor requests that the Court enter an Order approving the aforesaid loan on the terms stated herein and for such other relief as the Court may deem appropriate.

James E. Kane (VSB #30081) KANE & PAPA, P.C. 1313 East Cary Street Richmond, VA 23219 (804) 225-9500 (phone) (804) 225-9598 (fax) Counsel for Debtor Case 19-31894-KLP Doc 32 Filed 04/02/21 Entered 04/02/21 12:36:25 Desc Main Document Page 2 of 7

CHRISTIE MARIE LISBON

By: /s/ James E. Kane

Counsel

James E. Kane (VSB #30081) KANE & PAPA, P.C. 1313 East Cary Street Richmond, VA 23219 (804) 225-9500 (phone) (804) 225-9598 (fax) Counsel for Debtor

CERTIFICATE OF SERVICE

I hereby certify that on April 2, 2021, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record who have signed up to receive such notification and by first class mail to the parties on the attached list.

/s/ James E. Kane
James E. Kane

IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA

Richmond Division

IN RE:)	
)	
CHRISTIE MARIE LISBON)	Case No. 19-31894-KLF
)	Chapter 13
Debtor)	

NOTICE OF MOTION AND HEARING

The above Debtor has filed Motion to Incur Debt in the above matter.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then, within twenty-one (21) days from the date of this Notice you or your attorney must:

• File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above, to:

Clerk of Court United States Bankruptcy Court 701 East Broad Street Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire Kane & Papa, P.C. 1313 East Cary Street Richmond, Virginia 23219

Attend a hearing scheduled for April 14, 2021 at 10:00 a.m. at 701 E. Broad St., Room 5100, Richmond, VA 23219. If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

Case 19-31894-KLP Doc 32 Filed 04/02/21 Entered 04/02/21 12:36:25 Desc Main Document Page 4 of 7

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Dated: April 2, 2021

CHRISTIE MARIE LISBON

By: <u>/s/ James E. Kane</u>

Counsel

James E. Kane (VSB #30081) KANE & PAPA, P.C. 1313 East Cary Street Richmond, VA 23219 (804) 225-9500 (phone) (804) 225-9598 (fax) Counsel for Debtor

CERTIFICATE OF SERVICE

I hereby certify that on April 2, 2021, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record who have signed up to receive such notification and by first class mail to the parties on the attached list.

/s/ James E. Kane

James E. Kane

Case 19-31894-KLP 0422-3 Case 19-31894-KLP Eastern District of Virginia Richmond Fri Apr 2 10:49:26 EDT 2021 United States Bankruptcy Court

AR Resources, Inc. 701 East Broad Street Richmond, VA 23219-1888

Allied Cash Advance 5000 Nine Mile Road Suite A Richmond, VA 23223-5733

Bank of Missouri PO Box 89725 Sioux Falls, SD 57109-9725

Bridgecrest Attn: Bankruptcy 7300 E Hampton Ave, Ste 100 Mesa, AZ 85209-3324

Cash Net USA P.O.Box 643990 Cincinnati, OH 45264-0309

Commonwealth Radiology 1508 Willow Lawn Dr. Ste 117 Richmond, Va. 23230-3421

Debt Recovery Solution Attn: Bankruptcy P.O. 9003 Syosset, NY 11791-9003

First Virginia 9121 Staples Mill Road Henrico, VA 23228-2026

Henrico Doctors Hospital Resurgent Capital Services PO Box 1927 Greenville, SC 29602-1927

Doc 32 Filed 04/02/21 Entered 04/02/21 12:36:25 Desc Main Acquisitions Atlas Acquisitions LLC UST specification of the U. S. Trustee 701 East Broad St., Suite 4304 Richmond, VA 23219-1849

Attn: Bankruptcy Po Box 1056 Blue Bell, PA 19422-0287

Ashley Funding Services, LLC Resurgent Capital Services PO Box 10587 Greenville, SC 29603-0587

Bon Secours P.O. Box 409601 Atlanta GA 30384-9601

Bridgecrest Credit Company, LLC PO BOX 29018 PHOENIX, AZ 85038-9018

Cawthorn, Deskevich & Gavin 9701 Metropolitan Court Suite C Richmond, VA 23236-3694

Credit Acceptance 25505 West 12 Mile Rd Suite 3000 Southfield, MI 48034-8331

Fingerhut 6250 Ridgewood Road Saint Cloud MN 56303-0820

(p) FOCUSED RECOVERY SOLUTIONS 9701 METROPOLITAN COURT STE B RICHMOND VA 23236-3690

IC System PO Box 64794 Saint Paul MN 55164-0794 492C Cedar Lane, Ste 442 , NJ 07666-1713

Advance Financial ATTN: Virginia Billing 100 Oceanside Drive Nashville TN 37204-2351

(p) ATLAS ACQUISITIONS LCC 492C CEDAR LANE SUITE 442 TEANECK NJ 07666-1713

Bon Secours PO Box 1123 Minneapolis, MN 55440-1123

Cash 2 U Financial Service

3131 Mechanicsville Turnpike Richmond, VA 23223-1722

Commonwealth Financial 245 Main Street Scranton, PA 18519-1641

Credit One Bank P.O. Box 60500 City of Industry, CA 91716-0500

First Premier Bank Attn: Bankruptcy Po Box 5524 Sioux Falls, SD 57117-5524

Henrico Doctors Hospital 1602 Skipwith Rd Henrico, VA 23229-5298

James River Emergency Group P.O. Box 660827 Dallas TX 75266-0827

Case 19-31894-KLP (p) JEFFERSON CAPITAL SYSTEMS LLC PO BOX 7999 SAINT CLOUD MN 56302-7999

Page 6 of 7 Greenville, SC 29603-0497

Doc 32 Filed 04/02/21 Entered 04/02/21 12:36:25 Desc Main LNV Finding, LLC Page 6 of 7 Resurgent Capital Services PO Box 10587 Greenville, SC 29603-0587

Medicredit P 0 1629 Maryland Heights MO 63043-0629 Mid American Bank 5109 S Broadband Lane Sioux Falls, SD 57108-2208 NPRTO South-East, LLC 256 W. Data Drive Draper, Utah 84020-2315

Ortho Virginia 1115 Boulders Parkway Ste 200 Richmond, VA 23225-4067

Patient First P.O. Box 758941 Baltimore, MD 21275-8941

Patient First c/o Receivables Management Sys PO Box 73810 North Chesterfield, VA 23235-8047

(p) PORTFOLIO RECOVERY ASSOCIATES LLC PO BOX 41067 NORFOLK VA 23541-1067

Premier Bankcard, Llc Jefferson Capital Systems LLC Assignee Po Box 7999 Saint Cloud Mn 56302-7999

Progressive Leasing 256 West Data Drive Draper, UT 84020-2315

Quantum3 Group LLC as agent for CF Medical LLC PO Box 788 Kirkland, WA 98083-0788

Receivable Management 7206 Hull Street Rd Ste 211 Richmond, VA 23235-5826

Resurgent Capital PO Box 10497 Greenville, SC 29603-0497

Rolfe Emergency Physicians P.O. Box 37934 Philadelphia, PA 19101-0000

Speedy Cash PO Box 780408 Wichita, KS 67278-0408

Synchrony Bank/Care Credit Attn: Bankruptcy Dept Po Box 965060 Orlando, FL 32896-5060

Total Visa P O Box 5220 Sioux Falls, SD 57117-5220 Transworld Sys 500 Virginia Dr Ste 514 Fort Washington, PA 19034-2733

Tuckahoe Orthopaedic Assoc. P.O. Box 71690 Henrico, VA 23255-1690

Verizon by American InfoSource as agent 4515 N Santa Fe Ave Oklahoma City, OK 73118-7901

Verizon Virginia 500 Technology Drive Suite 300 Weldon Springs, MO 63304-2225

Virgina Physicians, Inc. P.O. Box 487 Mechanicsville VA 23111-0487

Virginia Credit Union Attn: Bankruptcy Department Po Box 90010 Richmond, VA 23225-9010

Virginia Credit Union Inc PO Box 90010 Richmond, VA 23225-9010

Virginia Ear Nose & Throat 3450 Mayland Court Henrico VA 23233-1468

Virginia Ear Nose & Throat Associates c/o Nguyen Ballato 2201 Libbie Ave Richmond, VA 23230-2364

Virginia Eye Institute 400 Westhampton Station Richmond, VA 23226-3332 Virginia Eye Institute 8002 Discovery Drive Suite 410 Richmond, VA 23229-8601

Case 19-31894-KLP irgina Physicians, Inc.
P.O. Box 487
Mechanicsville VA 23111-0487

Doc 32 Filed 04/02/21 Entered

Carl Doctinent Page 7 of 7
341 Dial 866-813-0912 Code: 8576180

P. O. Box 1819

Richmond, VA 23218-1819

Entered 04/02/21 12:36:25 Desc Main ge 7 of 7 Christie Marie Lisbon 4310 Mechanicsville Turnpike Mechanicsville, VA 23111-6212

James E. Kane
Kane & Papa, PC
1313 East Cary Street
P.O. Box 508
Richmond, VA 23218-0508

John P. Fitzgerald, III
Office of the US Trustee - Region 4 -R
701 E. Broad Street, Ste. 4304
Richmond, VA 23219-1849

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Atlas Acquisitions LLC 492C Cedar Lane, Ste 442 Teaneck, NJ 07666 Focused Recovery Solutions Attn: Bankruptcy 9701 Metropolitan Ct. Suite B Richmond, VA 23236-0000 Jefferson Capital Systems LLC Po Box 7999 Saint Cloud Mn 56302-9617

Portfolio Recovery Associates, LLC POB 41067 Norfolk VA 23541

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) Credit Acceptance Corp.

End of Label Matrix
Mailable recipients 64
Bypassed recipients 1
Total 65